

March 7, 2005

WM. TIMOTHY ALLEN, III
Direct: 318.934.0217
Email: tallen@bwor.com

FEDERAL EXPRESS

Honorable James H. Welsh
Commissioner of Conservation
State of Louisiana
Post Office Box 94275
Baton Rouge, Louisiana 70804-9275

RE: HEARING APPLICATION
Unit Well at Exceptional Location
JAMES RB SUJ
Converse Field
Sabine Parish, Louisiana
Our File No. 370306.0054

Dear Sir:

On behalf of PINNACLE OPERATING COMPANY, INC., application is hereby made for a public hearing to receive evidence concerning the issuance of an order pertaining to the following matters relating to the James Formation, Reservoir B, in the Converse Field, Sabine Parish, Louisiana:

1. To permit the applicant to designate and utilize the Pinnacle Operating Co., Inc. - JAMES RB SUJ; Cameron No. 3 Well as the unit well for JAMES RB SUJ, at the location shown on the attached plat, in exception to the well spacing provisions of Office of Conservation Order No. 501-B-3, effective May 9, 2000.
2. To explicitly find that the proposed unit well is necessary to drain a portion of the James Formation, Reservoir B in the Converse Field, underlying JAMES RB SUJ, which cannot be efficiently and economically drained by any existing well in such unit.
3. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

The James Formation, Reservoir B, in the Converse Field, Sabine Parish, Louisiana was fully defined in Office of Conservation Order No. 501-B-3, effective May 9, 2000.

The Rules of Procedure of the Commissioner of Conservation pertaining to the Pre-Application Notice requirements are not applicable to the hearing requested herein, which requires legal notice of only ten (10) days.

Pertinent data concerning the intended application will be made available for inspection at the offices of Blanchard, Walker, O'Quin & Roberts, Bank One Tower, 400 Texas Street, Shreveport, LA 71101. Any person wishing to inspect such data should call Mr. Wm. Timothy Allen III (318) 221-6858 during normal business hours or write Mr. Allen at the above address, in order to arrange a date and time for such inspection. A copy of any such pertinent data can be obtained at the expense of the requesting party.

A list of the names and addresses of all Interested Owners, Represented Parties and Interested Parties (as defined in the Rules of Procedure) is attached hereto, and a copy of this notice, with the annexed plat, is being sent to each of such persons. A reasonable effort has been made to determine that the enclosed list includes all of the persons to whom this notice must be sent under the Rules of Procedure.


A check in the amount of \$755.00 made payable to the Commissioner of Conservation is enclosed herewith as the statutory fee for holding the requested hearing.

This application is being filed in duplicate, and a copy hereof is being sent to Mr. James C. Broussard, Shreveport District Manager of the Office of Conservation, and to each Interested Owner, Represented Party and Interested Party whose name is shown on the attached list.

Very truly yours,

BLANCHARD, WALKER, O'QUIN & ROBERTS

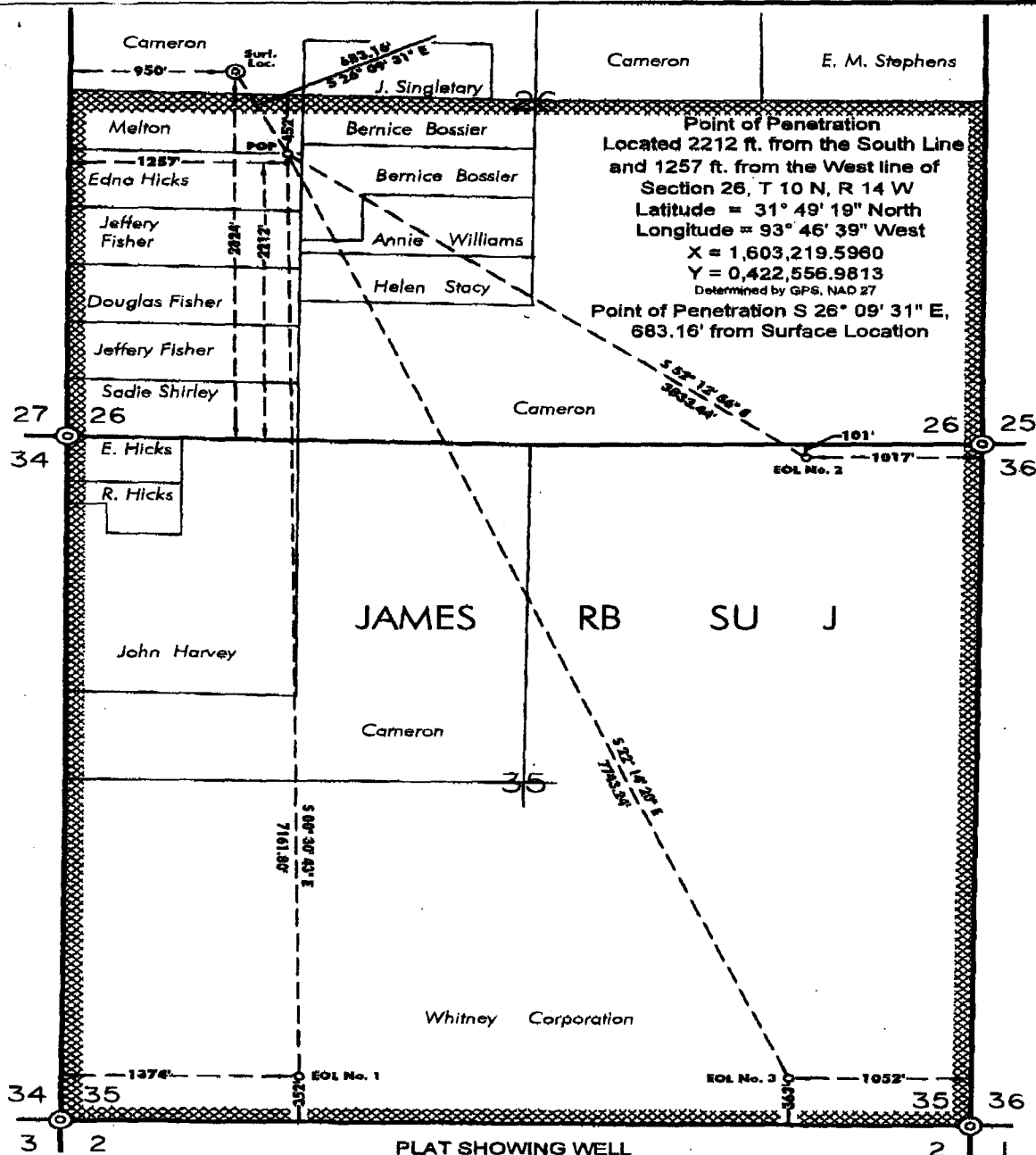
By:


Wm. Timothy Allen III
Attorneys for Pinnacle Operating Company, Inc.

WTAlII/bp
Enclosures

cc: Mr. James C. Broussard, Shreveport
District Manager, Office of Conservation
(w/encl.)

Interested Owners, Represented Parties
and Interested Parties (w/copy of plat only)



PLAT SHOWING WELL
PINNACLE OPERATING CO., INC. - JAMES RB SU J; CAMERON No. 3

Surface Location: Located 2824 ft. from the South line and 950 ft. from the West line of Section 26, Township 10 North, Range 14 West, Sabine Parish, Louisiana
End of Lateral No. 1: Located 352 ft. from the South line and 1374 ft. from the West line of Section 35, Township 10 North, Range 14 West, Sabine Parish, Louisiana
End of Lateral No. 2: Located 101 ft. from the North line and 1017 ft. from the East line of Section 35, Township 10 North, Range 14 West, Sabine Parish, Louisiana
End of Lateral No. 3: Located 363 ft. from the South line and 1052 ft. from the East line of Section 35, Township 10 North, Range 14 West, Sabine Parish, Louisiana

Surface Location
Latitude = 31° 49' 25" North
Longitude = 93° 46' 43" West
X = 1,602,918.42
Y = 0,423,170.17
Determined by GPS, NAD 27

EOL No. 1
Latitude = 31° 48' 08" North
Longitude = 93° 46' 37" West
X = 1,603,283.5920
Y = 0,415,395.4891
Determined by GPS, NAD 27

EOL No. 2
Latitude = 31° 48' 56" North
Longitude = 93° 46' 04" West
X = 1,606,249.2540
Y = 0,420,208.2646
Determined by GPS, NAD 27

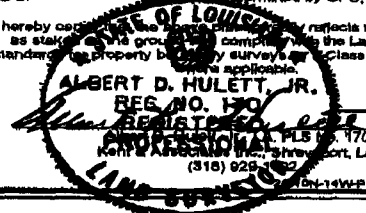
EOL No. 3
Latitude = 31° 48' 08" North
Longitude = 93° 46' 04" West
X = 1,606,150.1620
Y = 0,415,389.7224
Determined by GPS, NAD 27

NOTE: There are no dwellings or structures located within 500' of this location on date of staking.

Revised: January 18, 2005
Revised: October 29, 2004
Date: October 21, 2004

SCALE 1" = 1000'

I hereby certify that the foregoing correctly reflects the location as staked on the ground in compliance with the La. Minimum standards for property boundary surveys, or Class "D" survey, as applicable.



EN-14W-PINN-GAM-3-ALT-A-D